



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
OREGON OPERATIONS OFFICE
805 SW Broadway, Suite 500
Portland, Oregon 97205

June 12, 2009

Mr. Robert Wyatt
Northwest Natural & Chairman, Lower Willamette Group
220 Northwest Second Avenue
Portland, Oregon 97209

Re: Portland Harbor Superfund Site; Administrative Order on Consent for Remedial Investigation and Feasibility Study; Docket No. CERCLA-10-2001-0240 – EPA comments on Portland Harbor Remedial Action Objectives

Dear Mr. Wyatt:

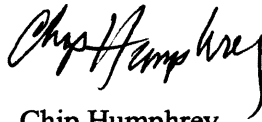
EPA has reviewed the Draft Remedial Action Objectives Text (RAO Text) dated April 24, 2009. The draft RAO Text was developed by the Lower Willamette Group (LWG) in response to a draft set of RAOs and associated management goals developed by the EPA following a series of meetings and exchange of information regarding the development of RAOs for the Portland Harbor site. EPA comments on the RAO text are attached. In addition, EPA has developed a table that summarizes the most recent EPA and LWG iteration of the RAOs and associated management goals and presents a set of recommended RAOs and associated management goals for the Portland Harbor site.

EPA believes that the attached RAO language addresses concerns raised by the LWG and at the same time, is consistent with the National Contingency Plan (NCP) and EPA's Contaminated Sediment Guidance. Although management goals are not contemplated in the NCP and are only briefly discussed in the Contaminated Sediment Guidance, EPA believes that these management goals are appropriate for the Portland Harbor site and has described how these management goals should be addressed in the Portland Harbor feasibility study (FS).

EPA expects to finalize the RAOs and associated management goals in the near future and looks forward to discussing this topic with you at our next management meeting that is currently being scheduled for the week of June 15, 2009.

If you have any questions, please contact Chip Humphrey at (503) 326-2678 or Eric Blischke (503) 326-4006. All legal inquiries should be directed to Lori Cora at (206) 553-1115.

Sincerely,

A handwritten signature in black ink, appearing to read "Chip Humphrey". The signature is fluid and cursive, with the first name "Chip" and last name "Humphrey" clearly distinguishable.

Chip Humphrey
Eric Blischke
Remedial Project Managers

cc: Greg Ulirsch, ATSDR
Rob Neely, NOAA
Ted Buerger, US Fish and Wildlife Service
Preston Sleeper, Department of Interior
Jim Anderson, DEQ
Kurt Burkholder, Oregon DOJ
David Farrer, Oregon Environmental Health Assessment Program
Rick Keppler, Oregon Department of Fish and Wildlife
Michael Karnosh, Confederated Tribes of Grand Ronde
Tom Downey, Confederated Tribes of Siletz
Audie Huber, Confederated Tribes of Umatilla
Brian Cunningham, Confederated Tribes of Warm Springs
Erin Madden, Nez Perce Tribe
Rose Longoria, Confederated Tribes of Yakama Nation